## RESP RECEIVED

AUG 26 2009

FirstCo Inc.

455 South Blue Grass Rd.

Walcott IA 52773

Phone: 563-284-5110 Fax: 563-284-4260

Date: August 14, 2009

To: Gary R. Witkovski

U.S. EPA Region 7

Federal Building

210 Walnut Street, Room 473

Des Moines IA 50309-2109

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AUG 1 7 2009

ARCM/ENSV

An audit was conducted at the FirstCo Inc Walcott Ia. location on 7/29/09 by William Starks and John Dixon. Two preliminary findings were identified.

- Failed to label two used oil storage containers with the words "used oil." 40
   CFR 279.22 c. We have corrected this condition by labeling all waste oils as "used oil". See attachment A for evidence of correction.
- 2. Failed to make a hazardous waste determination on waste in parts washer unit. An environmental management agency was contracted to remove waste in parts washer and to clean the parts washer. Attachment B shows evidence that the parts washer has been cleaned. Attachment C shows evidence of the service call completed by Safety Kleen on the parts washer. FirstCo Inc. has elected to remove the parts washer from the maintenance department.

**Trevor Thompson** 

General Manager FirstCo Inc.

563-284-5110

RCRA

527210

## NOTICE OF PRELIMINARY FINDINGS

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